

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION

CHARLOTTE CHARLES, *et al.*,

Plaintiffs,

v.

ANNE SACOOLAS, *et al.*,

Defendants.

Civil Case No. 1:20-cv-1052

**UNDER SEAL**

**MEMO ACCOMPANYING PROPOSED ORDER TO DISBURSE FUNDS TO  
PLAINTIFFS**

At the hearing before this Court on January 12, 2022, the Court indicated that it would order the Clerk of the Court to release [REDACTED] from the Court Registry to Plaintiffs. This amount represents the portion of the settlement funds in the above captioned matter that is undisputed and cannot be claimed as attorneys' fees or costs. At the hearing, the Court further invited Plaintiffs to submit a proposed order with instructions on how the Clerk should disburse the funds.

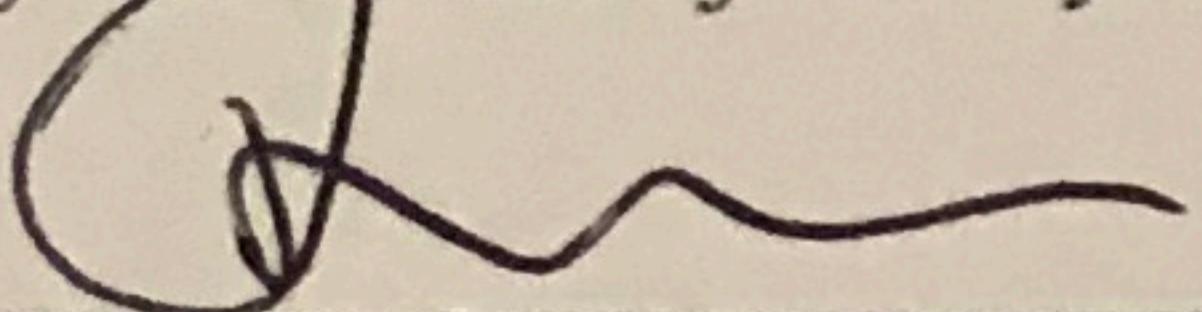
Having consulted with the Financial Administrator for the Clerk of the Court, the undersigned proposes ordering the Clerk to issue a check in the amount of [REDACTED] to Levy Firestone Muse LLP. Levy Firestone Muse LLP will then transfer the full amount to Plaintiffs according to their instructions (Plaintiffs have indicated that they would like Levy Firestone Muse LLP to send the money to Charlotte Charles through a currency transfer service.). This will be the most efficient way to deliver the funds to the Plaintiffs, in light of the logistical and currency exchange challenges presented by the Plaintiffs being located in the United Kingdom with bank accounts denominated in British pound sterling.

Plaintiffs have instructed the undersigned to convey this proposal to the Court and indicate their agreement by signing below.

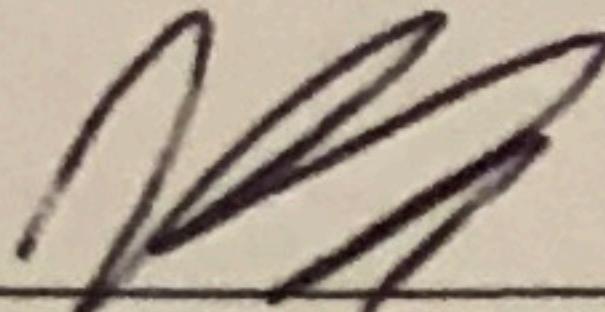
We agree.

C. Charles

Charlotte Charles  
*Individually and as co-administrator  
of the estate of Harry Dunn*



Tim Dunn  
*Individually and as co-administrator  
of the estate of Harry Dunn*



Niall Dunn  
*Individually*

14.01.22

Date

14/01/22

Date

14.01.22

Date

Respectfully submitted

By: /s/ Jay Rohit Nanavati  
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*Counsel for Plaintiffs*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that I electronically filed the foregoing with the Clerk of the Court using the ECF system, which notified defendants of the filing via electronic mail.

/s/ Jay Rohit Nanavati  
Jay Rohit Nanavati